From: Ruth Miller
Sent: Thursday, February 13, 2014 1:47 PM
To: CEQA Guidelines
Subject: Public Comment on LOS Alternatives

Good afternoon,

I interned with OPR during the summer of 2012 between years of study in the UC Berkeley Master of City Planning program. I've lived in Oakland for almost six years. I've worked for federal and state agencies as a transportation consultant with the firm Cambridge Systematics, Inc., and locally as a grassroots organizer for transportation justice in Oakland and the East Bay. As such, I have specific thoughts on the proposed CEQA changes, and appreciate the invitation to share them with OPR.

The draft goals list is generally spot on. I understand this is an early draft, but as it's refined, I'd like to offer the following suggestions.

- "maximize environmental benefits and minimize environmental harm" is vague. I think back to Tahoe, and the conflicts they had creating bike lanes because of the anticipated runoff (from the 3 foot bike lane). California is fortunate to have accepted environmentalism so thoroughly, but the realm of environmentalism is nuanced, and "environmental benefit" can mean different things to people with different priorities.
- Both access, the availability of destinations, as well as mobility, ease of movement, are central to a functional transportation system. It would be good to see mobility featured as prominently as access, particularly for the benefit of suburban transit users (or potential users) where plentiful bus stops but infrequent buses encourage vehicle use.

Of the replacement measures discussed, in my opinion VMT is superior. It's the most straightforward to model, advantages efficient uses of fuel and infrastructure, and will survive changes in fuel technologies. However:

- VMT is certainly easier to model than LOS, but depends on trip generation figures that are fairly debatable, and don't really take into account mixed use (as far as I know).
- A dense city with congested transit trunk lines might benefit from the option to apply a MVHT metric or the presumption of less than significant transportation impact.

To the specific questions in the document:

- Greenhouse gas emissions are a major impact, but particulate matter, runoff, and inefficient use of land are secondary (and the last difficult very to measure).
- Current roadway design guidelines allow generous lane widths that encourage faster than posted vehicle speed, while putting pedestrians and bicycles in or near conflict with

autos. **If infrastructure is going to encourage people to get out of their cars, it should also make it safe to do so.**

- The analysis models for these tools should be open source, online, and easy enough for city staff and interested neighbors to use.
- In the way that overbuilding roads induces driving, parking can also be more efficiently built. Removing parking minimums would be a very good start. Support for programs like San Francisco or Berkeley's demand-based parking pricing would be good follow up.

Generally, I'm excited as a Californian, transportation professional, and former OPR intern to see such excellent progress towards a better measure of development impact. Keep up the good work.

Ruth Miller